

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (FLW) (LHG)

***THIS DOCUMENT
RELATES TO ALL CASES***

CERTIFICATION OF P. LEIGH O'DELL, ESQ.

P. Leigh O'Dell, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.

2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Memorandum of Law in Opposition to Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc.'s Motion to Exclude Plaintiffs' Experts' Opinions Related to Biological Plausibility.

3. Attached hereto as Exhibit 1 is a true and correct copy of American College of Obstetricians and Gynecologists (ACOG): Ovarian Cancer FAQs (available at <https://www.acog.org/About-ACOG/ACOG-Districts/District-II/Ovarian-Peritoneal-Fallopian-Tube-Epithelial-Cancer>).

4. Attached hereto as Exhibit 2 is a true and correct copy ACOG/Society of Gynecologic Oncologists (SGO) Practice Bulletin Hereditary Breast and Ovarian Cancer Syndrome (2017).

5. Attached hereto as Exhibit 3 is a true and correct copy of the Expert Report of Judith Wolf, M.D. dated November 16, 2018.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Expert Report of Ellen Blair Smith, M.D. dated November 16, 2018.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Expert Report of Daniel Clark-Pearson, M.D. dated November 16, 2018.

8. Attached hereto as Exhibit 6 is a true and correct copy of the Expert Report of Arch Carson, M.D., Ph.D. dated November 16, 2018.

9. Attached hereto as Exhibit 7 is a true and correct copy of the Expert Report of Rebecca Smith-Bindman, M.D. dated November 16, 2018.

10. Attached hereto as Exhibit 8 is a true and correct copy of the Deposition of Kevin Holcomb, M.D., FACOG, taken on March 27, 2019.

11. Attached hereto as Exhibit 9 is a true and correct copy of the Deposition of Cheryl Saenz, M.D. taken on March 13, 2019.

12. Attached hereto as Exhibit 10 is a true and correct copy of the Deposition of Benjamin G. Neel, M.D., Ph.D. taken on March 19, 2019.

13. Attached hereto as Exhibit 11 is a true and correct copy of the Deposition of Gregory B. Diette, M.D. taken on April 9, 2019.

14. Attached hereto as Exhibit 12 is a true and correct copy of Kissler et al., *Uterine contractility and directed sperm transport assessed by hysterosalpingoscintigraphy (HSSG) and intrauterine pressure (IUP) measurement*, Acta Obstet Gynecol Scand 83: 369-374, 369-70 (2004).

15. Attached hereto as Exhibit 13 is a true and correct copy of Kunz et al., *The Uterine Peristaltic Pump Normal and Impeded Sperm Transport within the Female Genital Tract*, The Fate of the Male Germ Cell 49: 267-277 (1997).

16. Attached hereto as Exhibit 14 is a true and correct copy of Zervomanolakis et al., *Physiology of Upward Transport in the Human Female Genital Tract*, Ann. N.Y. Acad. Sci. 1101: 1-20 (2007).

17. Attached hereto as Exhibit 15 is a true and correct copy of the Expert Report of Laura M. Plunkett, PhD, DABT, dated November 16, 2018. (*filed under seal*)

18. Attached hereto as Exhibit 16 is a true and correct copy of the Deposition of Ellen Blair Smith, M.D., taken on January 9, 2019.

19. Attached hereto as Exhibit 17 is a true and correct copy of Henderson et al., *The Demonstration of the Migration of Talc from the Vagina and Posterior Uterus to the Ovary in the Rat*, Env. Res. 40: 247-250 (1986).

20. Attached hereto as Exhibit 18 is a true and correct copy of Halme et al., *Retrograde Menstruation in Healthy Women and in Patients with Endometriosis*, Obst. & Gyn. 64: 151-154 (1984).

21. Attached hereto as Exhibit 19 is a true and correct copy of Blumenkrantz et al., *Retrograde Menstruation in Women Undergoing Chronic Peritoneal Dialysis*, Obst. & Gyn. 57(5): 667-670 (1981).

22. Attached hereto as Exhibit 20 is a true and correct copy of Sjosten et al., *Retrograde migration of glove powder in the human female genital tract*, Human Reprod. 19: 991-995 (2004).

23. Attached hereto as Exhibit 21 is a true and correct copy of the Rule 26 Expert Report of Patricia G. Moorman, MSPH, Ph.D., dated November 16, 2019.

24. Attached hereto as Exhibit 22 is a true and correct copy of the Rule 26 Expert Report of Anne McTiernan, M.D., Ph.D., dated November 16, 2019.

25. Attached hereto as Exhibit 23 is a true and correct copy of the Rule 26 Expert Report of Sonal Singh, M.D., MPH, dated November 16, 2019.

26. Attached hereto as Exhibit 24 is a true and correct copy of the Rule 26 Expert Report of Judith Zelikoff, Ph.D., dated November 16, 2018.

27. Attached hereto as Exhibit 25 is a true and correct copy of Venter and Iturralde, *Migration of a Particulate Radioactive Tracer from the Vagina to the Peritoneal Cavity and Ovaries*, S. Afr. Medi. J. 55: 917-919 (1979).

28. Attached hereto as Exhibit 26 is a true and correct copy of the Rule 26 Expert Report of Jack Siemiatycki MSc, Ph.D., dated November 16, 2019

29. Attached hereto as Exhibit 27 is a true and correct copy of Iturralde and Venter, *Hysterosalpingo-Radionuclide Scintigraphy (HERS)*, Sem. in Nuc. Med. 11(4): 301-314 (1981).

30. Attached hereto as Exhibit 28 is a true and correct copy of Egli and Newton, *The Transport of Carbon Particles in the Human Female Reproductive Tract*, Fert. & Ster. 12: 151-155 (1961).

31. Attached hereto as Exhibit 29 is a true and correct copy of Folkins, et al., 2018. “Chapter 24 - Assessing Pelvic Epithelial Cancer Risk and Intercepting Early Malignancy.” In *Diagnostic Gynecologic and Obstetric Pathology* (Third Edition), 844–64.

32. Attached hereto as Exhibit 30 is a true and correct copy of Health Canada, Draft Screening Assessment, Talc, Environment and Climate Change Canada (Dec. 2018).

33. Attached hereto as Exhibit 31 is a true and correct copy of Schildkraut et al., *Association between Body Powder Use and Ovarian Cancer: The African American Cancer Epidemiology Study (AACES)*, Cancer Epidemiol. Biomarkers Prev. 25: 1411-1417 (2016).

34. Attached hereto as Exhibit 32 is a true and correct copy of Houghton et al., *Perineal Powder Use and Risk of Ovarian Cancer*, JNCI 106: 1-6 (2014).

35. Attached hereto as Exhibit 33 is a true and correct copy of Langseth et al., *Perineal use of talc and risk of ovarian cancer*, J. Epidemiol. Comm. Health 62: 358-360 (2008).

36. Attached hereto as Exhibit 34 is a true and correct copy of Merritt et al., *Talcum powder, chronic pelvic inflammation and NSAIDs in relation to risk of epithelial ovarian cancer*, Int. J. Cancer, 122: 170-176 (2008).

37. Attached hereto as Exhibit 35 is a true and correct copy of the Deposition of Dr. Judith Wolf, taken on January 7, 2019.

38. Attached hereto as Exhibit 36 is a true and correct copy of Huncharek et al., *Use of cosmetic talc on contraceptive diaphragms and risk of ovarian cancer: a meta-analysis of nine observational studies*, Euro. J. of Cancer Prev. 16(5): 422-429 (2009).

39. Attached hereto as Exhibit 37 is a true and correct copy of Heller et al., “Asbestos Exposure and Ovarian Fiber Burden,” *Am. J. of Indust. Med.* 29: 435-439, at p. 438 (1996).

40. Attached hereto as Exhibit 38 is a true and correct copy of DeBoer, “Transport of Particulate Matter Through the Human Female Genital Tract”, *J. Reprod. Fert.* 28, 295-297 (1972).

41. Attached hereto as Exhibit 39 is a true and correct copy of April 1, 2014 FDA Response to Citizen's Petition.

42. Attached hereto as Exhibit 40 is a true and correct copy of IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, *Arsenic, Metals, Fibres, and Dusts Volume 100 C A Review of Human Carcinogens*, (2012).

43. Attached hereto as Exhibit 41 is a true and correct copy of Exhibit 9 to the Deposition of Michael Birrer, M.D., Ph.D.

44. Attached hereto as Exhibit 42 is a true and correct copy of the Deposition of Michael Birrer, M.D., Ph.D., taken on March 29, 2019.

45. Attached hereto as Exhibit 43 is a true and correct copy of the Deposition of Michael Birrer, M.D., Ph.D., taken on September 25, 2018.

46. Attached hereto as Exhibit 44 is a true and correct copy of Gertig et al., *Prospective Study of Talc Use and Ovarian Cancer*, J. of the Nat'l Cancer Inst. 92(3): 249-252 (2000).

47. Attached hereto as Exhibit 45 is a true and correct copy of Cramer et al., Genital Talc Exposure and Risk of Ovarian Cancer, *Int. J. Cancer* 81: 351-356 (1999).

48. Attached hereto as Exhibit 46 is a true and correct copy of Henderson et al., *Talc and Carcinoma of the Ovary and Cervix*, The Journal of Obstetrics and Gynaecology 78: 266-272 (1971).

49. Attached hereto as Exhibit 47 is a true and correct copy of Heller et al., *The relationship between perineal cosmetic talc usage and ovarian talc particle burden*, Am. J. Obstet. Gynecol. 174: 1507-1510 (1996).

50. Attached hereto as Exhibit 48 is a true and correct copy of the Expert Report of Sarah Kane, M.D., dated November 16, 2018.

51. Attached hereto as Exhibit 49 is a true and correct copy of Heller et al., *Asbestos Exposure and Ovarian Fiber Burden*, Am. J. of Indust. Med. 29: 435-439 (1996).

52. Attached hereto as Exhibit 50 is a true and correct copy of Mostafa et al., *Foreign Body Granulomas in Normal Ovaries*, Obstetrics and Gynecology 66:701-702 (1985).

53. Attached hereto as Exhibit 51 is a true and correct copy of Cramer et al., *Presence of Talc in Pelvic Lymph Nodes of a Woman with Ovarian Cancer and Long-Term Genital Exposure to Cosmetic Talc*, Obstetrics & Gynecology 110(2): 498-501 (2007).

54. Attached hereto as Exhibit 52 is a true and correct copy of McDonald et al., *Correlative polarizing light and scanning electron microscopy for the assessment of talc in pelvic region lymph nodes*, Ultrastructural Pathology 43: 13-27 (2019).

55. Attached hereto as Exhibit 53 is a true and correct copy of Keskin, et al., *Does long-term talc exposure have a carcinogenic effect on the female genital system of rats? An experimental pilot study*, Arch Gynecol Obstet 280: 925-931 (2009).

56. Attached hereto as Exhibit 54 is a true and correct copy of Steiling et al., *Principles for the safety evaluation of cosmetic powders*, Tox. Letters 297: 8-18 (2018).

57. Attached hereto as Exhibit 55 is a true and correct copy of Kane et al., *Mechanisms of Fibre Carcinogenesis*, IARC Scientific Publications No. 140 (1996).

58. Attached hereto as Exhibit 56 is a true and correct copy of Penninkilampi, et al., *Perineal Talc Use and Ovarian Cancer*, Epidemiology 29: 41–49 (2018).

59. Attached hereto as Exhibit 57 is a true and correct copy of Mills et al., “Perineal talc exposure and epithelial ovarian cancer risk in the Central Valley of California,” *Int’l J. Cancer* 112(3): 458-464, at p. 458 (2004).

60. Attached hereto as Exhibit 58 is a true and correct copy of Wu et al., “Markers of inflammation and risk of ovarian cancer in Los Angeles County,” *Int. J. Cancer* 124: 1409-1415, at p. 1414 (2009).

61. Attached hereto as Exhibit 59 is a true and correct copy of Taher et al., “Systematic Review and Meta-Analysis of the Association between Perineal Use of Talc and Risk of Ovarian Cancer,” *unpublished* at p. 26 (2018).

62. Attached hereto as Exhibit 60 is a true and correct copy of Gates et al., “Talc use, variants of the GSTM1, GSTT1, and NAT2 genes and risk of epithelial ovarian cancer,” *Cancer Epidemiol Biomarkers Prev.* 17(9): 2436-2444, at p. 2443 (2008).

63. Attached hereto as Exhibit 61 is a true and correct copy of Balkwill, F. and A. Mantovani, *Inflammation and cancer: back to Virchow?* The Lancet 357: 539-545 (2001).

64. Attached hereto as Exhibit 62 is a true and correct copy of Coussens, L. and Zena Werb, *Inflammation and Cancer*, Nature 420: 860-867 (2002).

65. Attached hereto as Exhibit 63 is a true and correct copy of Okada, F., *Beyond foreign-body induced carcinogenesis: Impact of reactive oxygen species derived from inflammatory cells in tumorigenic conversion and tumor progressions*, Int. J. Cancer 121: 2364-2372 (2007).

66. Attached hereto as Exhibit 64 is a true and correct copy of Liou and Storz, *Reactive oxygen species in cancer*, Free Radical Research 44:479-496 (2010).

67. Attached hereto as Exhibit 65 is a true and correct copy of Grivennikov et al., *Immunity, Inflammation, and Cancer*, Cell. 140(6): 883-988 (2010).

68. Attached hereto as Exhibit 66 is a true and correct copy of Crusz and Balkwill, *Inflammation and cancer: advances and new agents*, Nature 12: 584-596 (2015).

69. Attached hereto as Exhibit 67 is a true and correct copy of Reuter et al., *Oxidative stress, inflammation, and cancer: How are they linked?* Free Radic Biol Med. 49(11): 1603-1616 (2011).

70. Attached hereto as Exhibit 68 is a true and correct copy of Kiraly et al., *Inflammation, DNA Damage and Mutations In Vivo*, PLO Genetics 11: 1-24 (2015).

71. Attached hereto as Exhibit 69 is a true and correct copy of Trabert et al., “Pre-diagnostic levels of inflammation markers and risk of ovarian cancer in the Prostate, Lung, Colorectal and Ovarian Cancer (PLCO) Screening Trial,” *Gynecol Oncol.* 135(2): 297-304 (2014).

72. Attached hereto as Exhibit 70 is a true and correct copy of National Academic of Sciences, Engineering, and Medicine (2016), *Ovarian cancers: Evolving paradigms in research and care*, Washington DC: The National Academic Press.

73. Attached hereto as Exhibit 71 is a true and correct copy of Fernandes et al., *The Role of the Mediators of Inflammation in Cancer Development*, Pathol. Oncol. Res. 21: 527-534 (2015).

74. Attached hereto as Exhibit 72 is a true and correct copy of the Deposition of Daniel Clarke-Pearson, M.D. taken on February 4, 2019.

75. Attached hereto as Exhibit 73 is a true and correct copy of the Export Report of Shawn Levy, PhD. dated November 16, 2019.

76. Attached hereto as Exhibit 74 is a true and correct copy of Yan et al., *Molecular analysis of genetic instability*, Cancer 512: 15-28 (2006).

77. Attached hereto as Exhibit 75 is a true and correct copy of Hanahan and Weinberg, *Hallmarks of Cancer: The Next Generation* (2011).

78. Attached hereto as Exhibit 76 is a true and correct copy of Savant et al., *The Role of Inflammation and Inflammatory Mediators in the Development, Progression, Metastasis, and Chemoresistance of Epithelial Ovarian Cancer*, Cancers 10, 251: 1-30 (2018).

79. Attached hereto as Exhibit 77 is a true and correct copy of Ness, Roberta B. and Carrie Cottreau, "Possible Role of Ovarian Epithelial Inflammation in Ovarian Cancer," *J. of the Nat'l Cancer Inst.* 91: 1459-1467 (1999).

80. Attached hereto as Exhibit 78 is a true and correct copy of JNJ 00000704.

81. Attached hereto as Exhibit 79 is a true and correct copy of Saed et al., *Updates on the role of oxidative stress in the pathogenesis of ovarian cancer*, Gynecologic Oncology 145: 595-602 (2017).

82. Attached hereto as Exhibit 80 is a true and correct copy of Shan, W. and Jinsong Liu, *Inflammation: A hidden path to breaking the spell on ovarian cancer*, Cell Cycle 8(19): 3107-3111 (2009).

83. Attached hereto as Exhibit 81 is a true and correct copy of Saed, Morris and Fletcher (2018), *New Insights into the Pathogenesis of Ovarian Cancer: Oxidative Stress*, Ovarian Cancer – From Pathogenesis to Treatment Chapter 4.

84. Attached hereto as Exhibit 82 is a true and correct copy of Freedman et al., *Peritoneal inflammation – A microenvironment for Epithelial Ovarian Cancer (EOC)*, J. of Translational Med. 2: 1-10 (2004).

85. Attached hereto as Exhibit 83 is a true and correct copy of Jiang et al., *Modulation of redox signaling promotes apoptosis in epithelial ovarian cancer cells*, Gynecol Oncol. 122(2): 1-17 (2011).

86. Attached hereto as Exhibit 84 is a true and correct copy of Belotte et al. 2014, *The Role of Oxidative Stress in the Development of Cisplatin Resistance in Epithelial Ovarian Cancer*, Reproductive Sciences 21(4): 503-508 (2014).

87. Attached hereto as Exhibit 85 is a true and correct copy of Fletcher et al., *Myeloperoxidase and free iron levels: Potential biomarkers for early detection and prognosis of ovarian cancer*, Cancer Biomarkers 10:267-275 (2011).

88. Attached hereto as Exhibit 86 is a true and correct copy of Saed et al., *Myeloperoxidase serves as a redox switch that regulates apoptosis in epithelial ovarian cancer*, Gynecol Onco. 116(2): 1-14 (2010).

89. Attached hereto as Exhibit 87 is a true and correct copy of Reid et al., *Gynecologic and Breast Cancers in Women After Exposure to Blue Asbestos in Wittenoom*, Cancer Epidemiology, Biomarkers & Prevention 18: 140-147 (2009).

90. Attached hereto as Exhibit 88 is a true and correct copy of Radic et al., *Immunosuppression induced by talc granulomatosis in the rat*, Clin. Exp. Immunol. 73: 316-321 (1988).

91. Attached hereto as Exhibit 89 is a true and correct copy of National Toxicology Program, "Toxicology and Carcinogenesis Studies of Talc," U.S. Dept. of Health and Human Servs., No. 421 at pp. 11, 56 (1993).

92. Attached hereto as Exhibit 90 is a true and correct copy of Kahn et al., *Nano-talc Stabilized TNF- α -mRNA in Human Macrophages*, J of Biomedical Nanotechnology 7: 112-113 (2011).

93. Attached hereto as Exhibit 91 is a true and correct copy of Ghio et al., *Disruption of Iron Homeostasis in Mesothelial Cells after Talc Pleurodesis*, Am J Respi Cell Mol Biol 46: 80-86 (2012).

94. Attached hereto as Exhibit 92 is a true and correct copy of Akhtar et al., *Cytotoxicity and Apoptosis Induction by Nanoscale Talc Particles from Two*

Different Geographical Regions in Human Lung Epithelial Cells, Environmental Tox 394-406 (2012).

95. Attached hereto as Exhibit 93 is a true and correct copy of Shukla et al., *Alterations in Gene Expression in Human Mesothelial Cells Correlate with Mineral Pathogenicity*, Am. J. Respir. Cell. Mol. Biol 41: 114-123 (2009).

96. Attached hereto as Exhibit 94 is a true and correct copy of Buz'Zard and Lau, *Pycnogenol reduces Talc-induced Neoplastic Transformation in Human Ovarian Cell Cultures*, Phytother. Res. 21: 579-586 (2007).

97. Attached hereto as Exhibit 95 is a true and correct copy of Akhtar, et al. "The Primary Role of Iron-Mediated Lipid Peroxidation in the Differential Cytotoxicity Caused by Two Varieties of Talc Nanoparticles on A549 Cells and Lipid Peroxidation Inhibitory Effect Exerted by Ascorbic Acid." *Toxicology in Vitro: An International Journal Published in Association with BIBRA* 24, no. 4 (June 2010): 1139-47.

98. Attached hereto as Exhibit 96 is a true and correct copy of Fletcher, NM, Amy K. Harper, MD, Ira Memaj, BS, Rong Fan, MS, Robert T. Morris, MD, and Ghassan M. Saed, PhD. "Molecular Basis Supporting the Association of Talcum Powder Use With Increased Risk of Ovarian Cancer." *Reproductive Sciences* 1-10. (2019).

99. Attached hereto as Exhibit 97 is a true and correct copy of the Expert Report of Shawn Levy, taken on January 11, 2019.

100. Attached hereto as Exhibit 98 is a true and correct copy of Davidson et al., “The Role of the Tumor Stroma in Ovarian Cancer,” *Front Oncol.* 4: 104 (2014).

101. Attached hereto as Exhibit 99 is a true and correct copy of Shin et al., *Establishment of five immortalized human ovarian surface epithelial cell lines via SV40 T antigen or HPV E6/E7 expression*, PLoS ONE 13(10): e0205297 (2018).

102. Attached hereto as Exhibit 100 is a true and correct copy of Wehner et al., Wehner et al., “Biological effects of cosmetic talc,” *Fd Chem. Toxic* 32(12): 1173-1184, at p. 1175 (1994).

103. Attached hereto as Exhibit 101 is a true and correct copy of the Deposition of Arch I. Carson, M.D., PhD, taken on January 19, 2019

104. Attached hereto as Exhibit 102 is a true and correct copy of the Deposition of Judith Zelikoff taken on January 21, 2019

105. Attached hereto as Exhibit 103 is a true and correct copy of Wehner, et al., On Talc Translocation From the Vagina to the Oviducts and Beyond, *Food Chem Toxicol* 24: 329-338 (1986)

106. Attached hereto as Exhibit 104 is a true and correct copy of Vanderhyden et al. “Animal models of ovarian cancer”, *Reproductive Biology and Endocrinology* 2003, I:67.

107. Attached hereto as Exhibit 105 is a true and correct copy of the Expert Report of Ghassan Saed, Ph.D. dated November 16, 2018.

108. Attached hereto as Exhibit 106 is a true and correct copy of Trabert et al., *Aspirin, Nonaspirin Nonsteroidal Anti-inflammatory Drug, and Acetaminophen Use and Risk of Invasive Epithelial Ovarian Cancer: A Pooled Analysis in the Ovarian Cancer Association Consortium*, JNCI J Natl Cancer Inst 106(2): (2014).

109. Attached hereto as Exhibit 107 is a true and correct copy of Trabert et al., “Analgesic Use and Ovarian Cancer Risk: An Analyasis in the Ovarian Cancer Cohort Consortium,” *J Nat Cancer Inst.* 111(2): 1-9, at p. 8 (2019).

110. Attached hereto as Exhibit 108 is a true and correct copy of Peres et al., “Analgesic medication use and risk of epithelial ovarian cancer in African American women,” *British J. of Cancer* 114: 819-825 (2016).

111. Attached hereto as Exhibit 109 is a true and correct copy of Rasmussen et al., “Pelvic Inflammatory Disease and the Risk of Ovarian Cancer and Borderline Ovarian Tumors: A Pooled Analysis of 13 Case-Control Studies,” *Am J Epidemiol.* 185(1): 8–20 (2017).

112. Attached hereto as Exhibit 110 is a true and correct copy of Stewart, et al., “Risk of high-grade serous ovarian cancer associated with pelvic inflammatory disease, parity and breast cancer,” *Cancer Epidemiology* 55: 110-116 (2018).

113. Attached hereto as Exhibit 111 is a true and correct copy of Cramer et al., “Conditions Associated with Antibodies Against the Tumor-Associated Antigen MUC1 and Their Relationship to Risk for Ovarian Cancer,” *Cancer Epidemiol Biomarkers Prev* 14(5): 1125-1131 (2005).

114. Attached hereto as Exhibit 112 is a true and correct copy of Karageorgi et al., *Perineal use of talcum powder and endometrial cancer risk*, *Cancer Epidemiol Biomarkers Prev.* 19(5): 1269-1275 (2010).

115. Attached hereto as Exhibit 113 is a true and correct copy of National Cancer Institute PDQ.

116. Attached hereto as Exhibit 114 is a true and correct copy of Jones, Richard E. and Kristen H. Lopez, “Human Reproductive Biology,” at 162 (4th Ed. 2006).

117. Attached hereto as Exhibit 115 is a true and correct copy of Sir Austin Bradford Hill, “The Environment and Disease: Association or Causation?,” *Proc R Soc Med* 58(5): 295-300, at p. 298 (1965).

118. Attached hereto as Exhibit 116 is a true and correct copy of Rothman et al., “Modern Epidemiology,” (3d Ed. 2008).

119. Attached hereto as Exhibit 117 is a true and correct copy of Oleckno, “Epidemiology: Concepts and Methods,” (1st ed. 2008).

120. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

/s/ P. Leigh O'Dell
P. Leigh O'Dell

Dated: May 29, 2019